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### REMARKS

#### Claim 24

Claim 24 was rejected as being unpatentable over Smith et al (hereinafter Smith) in view of Suzuki et al. (hereinafter Suzuki). It was again acknowledged in the Action that Smith failed to teach repeatedly and automatically reviewing the content of output documents to identify content that is repeatedly used and which can be replaced by a shorter access code, thereby reducing the volume of unique data to be added to the output documents. Suzuki was said to teach that function, referring to col. 3, line 66 to col. 4, line 6 and also col. 7, lines 54-67 of Suzuki.

The cited Suzuki patent teaches no such thing.

The first mentioned part of Suzuki teaches that an object of the invention is the improvement of coding efficiency by removing coding redundancy when coding a particular class of documents having image signals and wherein the documents have a large space, a color document having an area with a fixed color, or a document in which a statistical characteristic varies from one area to another. The cited segment also teaches that another object is to increase the processing speed of a decoding process for encoded documents.

The cited portion at col. 7, lines 54-67, is simply an exposition of the well-known entropy encoding technique, as an additional and final step to the inventive technique actually taught by Suzuki, which refers to to the processing of pixels in a manner which "averages" groups of different pixel values and represents the averaged blocks with symbols. Suzuki then describes using the entropy encoding technique to identify repeating blocks of identical symbols and to allocate shorter or

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longer other codes to these generated symbols according to their frequency distribution, and finally to store the list of codes and their associated symbol blocks together with the associated substituted string representing the document in encoded form within the generated output document.

At no time or place does Suzuki suggest that repeated and automatic scanning takes place, even on the single document to which the entropy encoding technique is applied, and certainly not across a plurality of output documents at a service center as is recited in Claim 24.

Furthermore, Suzuki does not suggest that any redundant "document part" generated during his process and then identified by processing be retained for future use as input into subsequent similar processing being performed on subsequent image signal documents belonging to the same client, nor does Suzuki provide for such an eventuality. Thus, Suzuki lacks any teaching of repeatedly and automatically reviewing the text of output documents stored for a client to identify phrases repeatedly used by that client and which are not part of the stored data, and adding the identified phrases to the data comprising parts of the documents to be generated, thereby reducing unique data to be added to output documents.

Accordingly, Claim 24 is allowable.

#### Claim 25

In paragraphs 11 and 12 of the Action, Claim 25 was rejected as being unpatentable under §103(a) over Smith in view of Suzuki. As discussed above, Suzuki does not show that for which it was cited either in the specifically identified portions of text or elsewhere in the patent. Accordingly, the rejection is without merit. In addition, Claim 25 further limits claim 24 and is

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therefore allowable therewith.

#### Claim 26

Claim 26 was also rejected as being unpatentable over Smith in view of Suzuki. Claim 26 is dependent upon claims 25 and 24 and is allowable therewith. In addition, it should be understood that the document output from a service center contains only the access codes and, usually, unique data. The repeated document parts described by the access codes do not necessarily form part of the document output. This is totally contrary to the teaching of Suzuki wherein the meanings of the access codes, in the form of an associative list of document parts and access codes, together with the document in the form of a list of access codes and unique data, comprise the main parts of the output document to be transmitted.

#### Claims 27 and 28

Claims 27 and 28 were also rejected as being unpatentable over Smith and Suzuki. These claims are dependent on claim 24 and should be allowable therewith for the reasons discussed above.

In addition, it should be noted that Suzuki teaches nothing about the text of these claims. The entropy encoding technique used by Suzuki does not comprise the review of output documents to identify phrases repeatedly used but, instead, involves scanning a particular modified image signal in process of becoming a single output document. It cannot, as the Examiner asserts, identify processed image phrases repeatedly used by the particular image signal's owner (the client) either in the subject document or other signal documents, nor can it store such phrases anywhere other than the subject document. The rejections

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of these claims are therefore without basis.

#### Claim 29

Claim 29 is independent but also includes language which clearly distinguishes the claim from the teachings of Smith and/or Suzuki. Specifically, claim 29 recites reviewing automatically and in a learning mode the content of the output documents to identify parts thereof that are repeatedly used amongst such documents, generating automatically a storage access code uniquely associated with such identified document parts and adding the identified document parts, each with its uniquely associated storage access code, to the stored data comprising parts of documents to be compiled, compiling and storing output documents of selected format and content and designated unique data by substituting in response to requests from clients the storage access codes of the document parts identified in and by document output compilation requests from clients, and transmitting the output documents to a recipient service center, thereby reducing unique data to be added to output documents.

Neither Smith nor Suzuki includes a teaching of a learning mode meeting the requirements of this language. Accordingly, claim 29 should be allowed.

#### Claims 30 and 31

Claims 30 and 31 include language such as "repeatedly and automatically reviewing the text of output documents stored for a client to identify phrases repeatedly used by that client and which are not part of the stored data, and adding the identified phrases to the data comprising parts of documents to be generated, thereby reducing unique data to be added to output documents". This language is in combination with other features

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of the system. As pointed out above, a teaching of this aspect of the invention is nowhere taught by Suzuki or Smith, alone or in any proper combination, and claims 30 and 31 should therefore be allowable.

Claims 32-48

Claims 32 through 48 are all ultimately dependent on claim 31 and should therefore be allowable therewith. While these claims may also include other distinguishing features, they are allowable whether or not that is true and it does not appear to be necessary to discuss such features separately.

Claims 50 and 51

Claims 50 and 51 were rejected as being anticipated by Smith. However, claim 50, among other features, recites repeatedly and automatically reviewing the text of output documents stored for a client to identify phrases repeatedly used by that client and which are not part of the stored data, and adding the identified phrases to the data comprising parts of documents to be generated, thereby reducing unique data to be added to output documents. It was acknowledged in the Action (with reference to other claims) that this feature is not shown by Smith. Furthermore, as pointed out above, this feature is not taught by Suzuki. Accordingly, the rejection on this basis of claim 50 is clearly in error and should be withdrawn.

Claim 51 is dependent on claim 50 and should be allowable therewith.

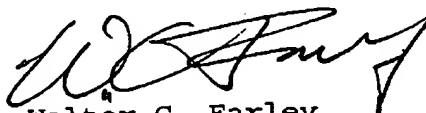
Claims 52 and 53

Claims 52 and 53 were separately rejected as being unpatentable over Smith in view of Perry which was cited as

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showing means for storing and printing documents for sale. However, claims 52 and 53 are dependent on claim 50 which, as described above is allowable as including repeatedly and automatically reviewing the text of output documents stored for a client to identify phrases repeatedly used by that client and which are not part of the stored data, and adding the identified phrases to the data comprising parts of documents to be generated, thereby reducing unique data to be added to output documents. Perry does not show any such feature, nor does any other reference cited and relied upon in the Action. Since claims 52 and 53 are dependent on claim 50, they should be allowable therewith, regardless of whatever storing and printing features are shown in Perry.

Respectfully submitted,



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